## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

In re:

M3 POWER RAZOR SYSTEM MARKETING & SALES PRACTICES LITIGATION

CIVIL ACTION NO: C.A. No. 05-11177

(LEAD CASE)

MDL Docket No: 1704

THIS DOCUMENT RELATES TO: ALL ACTIONS

ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFF CARLOS CORRALES' (1) OBJECTION TO THE "CONSOLIDATED"
AMENDED COMPLAINT AND (2) MOTION FOR ORDER ALLOWING PLAINTIFF
CARLOS CORRALES TO PROCEED UNDER HIS OWN COMPLAINT AND WITH HIS
OWN COUNSEL: MEMORANDUM OF REASONS

Plaintiffs Mark Dearman, Anthony DeBiseglia, Matthew Marr, Adam Kline, Greg Besinger, Collin L. McGeary and Javier Tunon ("Plaintiffs"), through their undersigned counsel, hereby move this Court for an order to extend the time within which they may respond to Plaintiff Carlos Corrales' (1) Objection to the "Consolidated" Amended Complaint, and (2) Motion for Order Allowing Plaintiff Carlos Corrales to Proceed under His Own Complaint and With His Own Counsel; Memorandum of Reasons (the "Objection and Motion") until May 25, 2006.

As reasons therefor, Plaintiffs state as follows:

1. Plaintiffs filed their Consolidated Class Action Complaint (the "Consolidated Complaint") on April 18, 2006. On May 4, 2006, Plaintiff Carlos Corrales ("Corrales") filed his Objection and Motion objecting to the Consolidated Complaint and seeking an order allowing him to proceed under his own complaint and with his own counsel. Pursuant to Local Rule 7.1(B)(2), the deadline for filing Plaintiffs' response to Corrales' Objection and Motion is May 18, 2006.

2. Plaintiffs' counsel respectfully submit that they require additional time to prepare and file their response to Corrales' Objection and Motion. Plaintiffs' counsel have conferred with Corrales' counsel, who has assented to the relief requested in this motion.

WHEREFORE, Plaintiffs request that this Court enter an order to extend the time within which they may file their response to Corrales' Objection and Motion until May 25, 2006.

Dated: May 17, 2006 Respectfully submitted,

## /s/Theodore M. Hess-Mahan

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## **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

I hereby certify that the parties' counsel have conferred in a good faith effort to narrow or resolve the issues raised in this motion. Plaintiff Carlos Corrales' counsel have assented to the relief requested herein.

> /s/Theodore M. Hess-Mahan Theodore M. Hess-Mahan

## CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as nonregistered participants on the 17th day of May, 2006.

> /s/Theodore M. Hess-Mahan Theodore M. Hess-Mahan